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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

JOHN DOE,  
Plaintiff,  
v.

DONALD J. TRUMP, in his official capacity as  
President of the United States of America, *et al.*,  
Defendants.

Case No. 4:25-cv-03140-JSW

**STIPULATION TO EXTEND THE DUE DATE  
FOR DEFENDANTS' SUPPLEMENTAL  
OPPOSITION TO PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION; ~~PROPOSED~~  
ORDER**

The Honorable Jeffrey S. White

S.Y., *et al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as  
Secretary of the United States Department of  
Homeland Security, *et al.*,  
Defendants.

Case No. 4:25-cv-3244-JSW

ZHOUEER CHEN, *et al.*

Plaintiff,

Case No. 4: 25-cv-3292-JSW

STIPULATION  
4:25-cv-03140- JSW and related cases

V.

KRISTI NOEM, *et al.*,

Defendants.

J.C. *et al.*,

Plaintiffs,

V.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3502-JSW

## STIPULATION

4:25-cv-03140- JSW and related cases

On May 7, 2025, the Court granted the parties' stipulation to an extension of time for Defendants' supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the deadline for Defendants' opposition on May 8, 2025, at 5:00 p.m. *See* Dkt. No. 58. The Court noted that "[i]f the parties are not able to resolve these matters, the Court reserves the right to continue the hearing to May 14, 2025 at 10:00 a.m."

Following the Court's order, Plaintiffs and Defendants have been continuing to engage in negotiations to explore whether a potential resolution of these cases might be possible. Accordingly, the parties respectfully request the Court to grant an extension of time for Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' opposition to May 9, 2025, at 5:00 p.m. The parties additionally request that the Court set the due date for Plaintiffs' reply for May 13, 2025, at 12:00 p.m., and set a hearing in this matter for May 14, 2025, at 10:00 a.m., which is the date and time the Court, in its May 7 order, stated it might set the hearing for, should there be any further extensions sought. Since the parties are now requesting those brief further filing extensions, they request that the Court does set the hearing in this matter for the May 14, 2025, date at 10:00 a.m. The parties do not anticipate any further extensions of time will be sought.

Dated: Respectfully submitted,<sup>1</sup>  
PATRICK D. ROBBINS  
Acting United States Attorney

*s/ Elizabeth D. Kurlan*  
ELIZABETH D. KURLAN  
Assistant United States Attorney

Attorneys for Defendants

Dated: *s/ John Nicholas Sinodis*  
JOHN NICHOLAS SINODIS  
Van Der Hout, LLP

<sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

s/ Andre Y. Bates

ANDRE Y. BATES

DeHeng Law Offices PC

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental opposition to Plaintiffs' motion for preliminary injunction by May 9, 2025, at 5:00 p.m. Plaintiffs will file their reply by May 13, 2025, at 12:00 p.m. A hearing will be held on May 14, 2025, at 10:00 a.m.

May 9, 2025

